



August 21, 2006

EX PARTE: ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**RE: In the Matter of the Review of the Emergency Alert System (EB 04-296);
In the Matter of E9-1-1 Requirements for IP-Enabled Service Providers (WC 05-196);
In the Matter of the Recommendations of the Independent Panel Reviewing the
Impact of Hurricane Katrina on Communications Networks (EB 06-119)**

Dear Ms. Dortch:

On August 9th, 2006, Skip Speaks, CEO of Rosum Corporation, sent a letter by overnight express to FCC Commissioner Deborah Tate, providing comments on the above-mentioned dockets. The letter is appended to this filing.

Thank you for your attention. Questions regarding this filing may be directed to the undersigned.

Sincerely yours,

Jon Metzler
Business Development Director
Rosum Corporation

Cc: Commissioner Deborah Tate
Aaron Goldberger
Skip Speaks
James Green



August 9, 2006

The Honorable Deborah Tate
Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Commissioner Tate:

It was a pleasure meeting you last week during your visit to the San Francisco Bay Area. Thank you for your time, and for your support of the technology community here in Silicon Valley.

Thank you for the offer to make our voice heard at the Commission. As I mentioned on Monday, we are happy with the level of leadership it has shown on a number of important public safety issues. In particular, Chairman Martin is to be commended for a proactive stance regarding VoIP E9-1-1 and his response to the Gulf State hurricanes of 2005.

I am sending comments specific to two dockets under review.

Docket WC 05-196: In The Matter of E911 Requirements For IP-enabled Service Providers:

Requiring automatic location capability. In its NPRM of May 19, 2005, the Commission solicited comment on whether automatic location capability of E9-1-1 calls from IP-enabled services should be made a requirement. Currently self-provisioning of address by the customer is the standard. This poses a number of potential safety hazards, ranging from mistyping to forgetfulness to simply not knowing the correct address. Some customers may even provide a false address. With these potential issues in mind, we believe that automatic location capability best serves the interest of public safety. Moreover, cost-feasible technology options that will not stunt the VoIP market's noteworthy growth are available now and deployable today.

Docket EB 04-296: In the Matter of the Review of the Emergency Alert System:

The Commission began review of the Emergency Alert System in 2004. The 2005 Gulf State hurricanes gave new urgency to this review. While the Commission has rightly focused on the need to expand the EAS to include mobile devices such as cellphones, the cellular infrastructure remains vulnerable to power outages and quality of service issues during disasters. The TV infrastructure, by contrast, is generally robust in the face of disasters, as was shown during those same hurricanes, after which the National Association of Broadcasters received commendation from President Bush for their performance. Accordingly, we would urge the following two measures:

- 1) Creating standards for back-up power at the studio and transmitter. Currently this is left to the broadcasters, which due to clear business need, have backup power available. We believe this should be standardized on two (2) weeks worth of power. The Commission, through its Media Security and Reliability Council (MSRC I), has previously provided guidance on this subject, but did not make specific recommendations as to how long power should



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last. Katrina's aftermath showed that power supplies should be sufficient to enable autonomous operation for over a week. At the very least, plans for delivery of backup supplies should be made in advance.

- 2) Stabilizing broadcast emission times. Timing is an integral function of GPS that is used to enable various functionalities in telecommunications networks. Currently, however, TV emission times are not synchronized to a common reference. While these varied sources of timing data are still usable for positioning through our architecture, synchronizing emission times to a known reference, such as GPS, would enable on-device positioning and faster positioning times, both of which would be highly advantageous for public safety applications such as first response. Stabilizing emission times would enable replication of all the major functions of GPS – Positioning, Navigation and Timing – right here on the ground, in places where GPS does not work, such as indoors or in urban canyons.

The foregoing comments regarding the EAS docket also apply to EB 06-119, *Reviewing the Impact of Hurricane Katrina on Communications Networks*.

Thank you for the opportunity to provide these comments. I hope this information is helpful to you in making your own analysis of these issues. We have met with Commission staff regarding both dockets, in particular the Office of Engineering & Technology, Wireline Competition, and the Enforcement Bureau, and have found dialogue to be thoughtful and constructive. We look forward to communicating further with you and your staff on these important public safety issues.

Best wishes, and thank you again for your support of the technology community.

Sincerely yours,

Skip Speaks
CEO
Rosum Corporation